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28 UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

GUARDIAN PROTECTION PRODUCTS,
INC., a Delaware corporation,

Plaintiff,

vs.

G.P.P., INC. d/b/a GUARDIAN
INNOVATIVE SOLUTIONS, a Pennsylvania
corporation,

Defendant.

CASE NO. 1:20-CV-01680-SKO

**STIPULATION AND ORDER TO
MODIFY SCHEDULING ORDER**

Complaint filed: November 24, 2020

Counterclaim filed: February 22, 2021

Pre-Trial Conference: June 18, 2025, at 2:30
p.m.

Trial: August 12, 2025, at 8:30 a.m.

G.P.P., INC. d/b/a GUARDIAN
INNOVATIVE SOLUTIONS, a Pennsylvania
corporation,

Counterclaimant,

vs.

GUARDIAN PROTECTION PRODUCTS,
INC., a Delaware corporation,

Counter-defendant.

(Doc. 60)

Pursuant to the Court's modified Scheduling Order [Dkt. No. 54] and L.R. 143,
Plaintiff/Counterdefendant Guardian Protection Products, Inc. ("Guardian") and
Defendant/Counterclaimant G.P.P. Inc. d/b/a Guardian Innovative Solutions ("GIS") hereby
submit the following stipulation and proposed order to further modify the Scheduling Order.

WHEREAS, on April 16, 2021, this Court issued a Scheduling Order [Dkt. No. 30] in this
matter;

WHEREAS, on October 14, 2021 the parties submitted a Stipulation and Proposed Order
to modify the scheduling order [Dkt. No. 40], and on October 15, 2021 the Court modified the
Scheduling Order [Dkt. No. 41];

WHEREAS, following a week-long trial, on December 13, 2021, this Court issued a final
judgment [Dkt. No. 499] in the related case entitled *G.P.P., Inc. d/b/a Guardian Innovative*

Solutions v. Guardian Protections Products, Inc., et al., Case No. 1:15-cv-00321-SKO (the “Related Case”);

WHEREAS, on February 3, 2022, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order based largely on the status of the Related Case [Dkt. No. 42], and on February 4, 2022, the Court modified the Scheduling Order [Dkt. No. 43];

WHEREAS, on August 3, 2022, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order based largely on the status of the Related Case [Dkt. No. 44], and on August 5, 2022, the Court modified the Scheduling Order [Dkt. No. 46];

WHEREAS, on January 30, 2023, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order based largely on the status of the Related Case [Dkt. No. 48], and on January 31, 2023, the Court modified the Scheduling Order [Dkt. No. 49];

WHEREAS, on August 22, 2023, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order [Dkt. No. 50], and on August 24, 2023, the Court modified the Scheduling Order [Dkt. No. 51];

WHEREAS, on April 17, 2024, the parties submitted a Further Stipulation and Proposed Order to modify the scheduling order [Dkt. No. 53], and on April 18, 2024, the Court modified the Scheduling Order [Dkt. No. 54] as follows:

Event	Continued Date
Non-Expert Discovery	September 13, 2024
Expert Disclosures	September 27, 2024
Rebuttal Expert Disclosures	October 11, 2024
Expert Discovery	October 25, 2024
Non-Dispositive Motion Filing	October 25, 2024
Non-Dispositive Motion Hearing	December 4, 2024
Dispositive Motion Filing	February 7, 2025

Dispositive Motion Hearing	March 19, 2025
Deadline to Request Settlement Conference	May 14, 2025, or 90 days before trial, whichever is later
Pretrial Conference	June 18, 2025, at 2:30 p.m.
Trial	August 12, 2025, at 8:30 a.m.

WHEREAS, the parties have submitted expert disclosures and expert rebuttal disclosures in this matter;

WHEREAS, the parties have been attempting to complete expert discovery within the continued date;

WHEREAS, due to limited expert availability, absent an extension, the parties would be required to complete expert depositions after the continued date of October 25, 2024;

WHEREAS, the parties are seeking an extension to allow for the completion of expert discovery and the filing of non-dispositive motions;

WHEREAS, the parties are not seeking to modify the dispositive motion or trial dates as established in the Scheduling Order [Dkt. No. 54];

WHEREAS, the parties believe that the extensions requested herein are reasonable and necessary in order to provide the parties with adequate time to complete expert discovery and prepare any non-dispositive motions without unnecessarily straining the resources of both parties and their counsel;

ACCORDINGLY, IT IS HEREBY STIPULATED and REQUESTED by the parties that the Scheduling Order [Dkt. No. 54] be further modified as follows:

Event	Continued Date
Expert Discovery	November 15, 2024
Non-Dispositive Motion Filing	November 15, 2024
Non-Dispositive Motion Hearing	December 18, 2024
Dispositive Motion Filing	February 7, 2025
Dispositive Motion Hearing	March 19, 2025
Deadline to Request Settlement Conference	May 14, 2025, or 90 days before trial, whichever is later
Pretrial Conference	June 18, 2025, at 2:30 p.m.
Trial	August 12, 2025, at 8:30 a.m.

IT IS SO STIPULATED.

Dated: October 16, 2024

GORDON REES SCULLY MANSUKHANI,
LLP

By: /s/ Aaron P. Rudin
Calvin E. Davis
Aaron P. Rudin
Rebecca Krikorian
Attorneys for Plaintiff and Counter-
Defendant
GUARDIAN PROTECTION PRODUCTS,
INC.

1 Dated: October 16, 2024

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

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3 By: /s/ Dylan G. Savage
Dylan G. Savage
4 Attorneys for Defendant and Counter-
Claimant G.P.P., INC. d/b/a GUARDIAN
5 INNOVATIVE SOLUTIONS
6 (as authorized on October 15, 2024)
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ORDER

Finding good cause therefore (*see* Fed. R. Civ. P. 16(b)(4)), the parties' stipulation (Doc. 60) is hereby approved. Accordingly, IT IS HEREBY ORDERED that the Scheduling Order (Doc. 54) is MODIFIED as follows:

Event	Continued Date
Expert Discovery	November 15, 2024
Non-Dispositive Motion Filing	November 15, 2024
Non-Dispositive Motion Hearing	January 8, 2025 ¹
Dispositive Motion Filing	February 7, 2025
Dispositive Motion Hearing	March 19, 2025
Deadline to Request Settlement Conference	May 14, 2025
Pretrial Conference	June 18, 2025, at 2:30 p.m.
Trial	August 12, 2025, at 8:30 a.m.

IT IS SO ORDERED.

Dated: **October 16, 2024**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE

¹ Pursuant to Local Rule 230(c), and in order to accommodate the federal holidays, the hearing date has been continued.